

**LEWIS BRISBOIS BISGAARD & SMITH LLP**

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Attorneys for Defendants INTERVENTION AGENCY, INC.;  
LEONARD MONTALVO; DAVID POLARIS; and  
WEISS SULTAN, erroneously sued herein as SULTAN

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

ALEJANDRA CRUZ, OSCAR  
TINOCO, A Minor, By and Through His  
Guardian Ad Litem, ISABEL CRUZ,  
ALEJANDRO CRUZ, ISRAEL ORTIZ,  
CARLOS GALLARDO

Plaintiffs,

v.

The CITY OF OAKLAND, V. RIVERA,  
Individually And in His Capacity as A  
Police Officer For The City of Oakland,  
B. KLINE, Individually And in His  
Capacity as A Police Officer For The  
City of Oakland, M. MUNOZ,  
Individually And in His Capacity as A  
Police Officer For The City of Oakland,  
INTERVENTION AGENCY, INC.,  
LEONARD MONTALVO, DAVID  
POLARIS, SULTAN, JAMES WEISS,  
EVA GARCIA, DOES 1 To 600

Defendants.

CASE NO. C04 00179 CW

**STIPULATION TO PROTECTIVE  
ORDER REGARDING LEONARD  
MONTALVO'S DEPOSITION**

TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD:

Pursuant to FRCVP 26(c), it is hereby stipulated by the parties to this action  
through their attorneys of record that Leonard Montalvo's residence addresses  
located in Oakland, California and Stockton, California, as identified at his June 22,

1 2005, deposition will not be disclosed to the public.

2 The parties agree not to disclose this information to the public as the nature  
3 of Mr. Montalvo's security business requires him to come into contact with drug  
4 dealers, thieves and gang members. Disclosing Mr. Montalvo's personal and  
5 confidential information to the public has a potential of jeopardizing the safety of  
6 Mr. Montalvo and his family.

7 DATED: July 21, 2005

LEWIS BRISBOIS BISGAARD & SMITH LLP

8 JEFFERY G. BAIREY  
9 KIMBERLEI D. EVANS

10  
11 By Kimberlei D. Evans  
12 Kimberlei D. Evans  
13 Attorneys for Defendants INTERVENTION  
14 AGENCY, INC., LEONARD MONTALVO,  
DAVID POLARIS, and WEISS SULTAN

15 DATED: July 14, 2005

Steven R. Jacobsen  
James L. Armstrong

16  
17 By James L. Armstrong  
18 Attorneys for plaintiffs

19 DATED: July \_\_, 2005

Arlene M. Rosen

20 By \_\_\_\_\_  
21 Attorneys for defendant CITY OF OAKLAND

22 DATED: July \_\_, 2005

Fred M. Feller  
Ramon M. Gonzalez

24  
25 By \_\_\_\_\_  
26 Attorneys for defendants JAMES WEISS and  
27 EVA GARCIA  
28

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7 DATED: July \_\_, 2005 LEWIS BRISBOIS BISGAARD & SMITH LLP  
8 JEFFERY G. BAIREY  
9 KIMBERLEI D. EVANS

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12 Kimberlei D. Evans  
13 Attorneys for Defendants INTERVENTION  
14 AGENCY, INC., LEONARD MONTALVO,  
DAVID POLARIS, and WEISS SULTAN

15 DATED: July 14, 2005 Steven R. Jacobsen  
16 James L. Armstrong

17 By James L. Armstrong  
18 Attorneys for plaintiffs

19 DATED: July \_\_, 2005 Arlene M. Rosen

20 By \_\_\_\_\_  
21 Attorneys for defendant CITY OF OAKLAND

22 DATED: July \_\_, 2005 Fred M. Feller  
23 Ramon M. Gonzalez

24 By \_\_\_\_\_  
25 Attorneys for defendants JAMES WEISS and  
26 EVA GARCIA

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2005, deposition will not be disclosed to the public.

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DATED: July \_\_, 2005

LEWIS BRISBOIS BISGAARD & SMITH LLP

JEFFERY G. BAIREY  
KIMBERLEI D. EVANS

By

Kimberlei D. Evans  
Attorneys for Defendants INTERVENTION  
AGENCY, INC., LEONARD MONTALVO,  
DAVID POLARIS, and WEISS SULTAN

DATED: July \_\_, 2005

Steven R. Jacobsen  
James L. Armstrong

By

Attorneys for plaintiffs

DATED: July 19, 2005

Arlene M. Rosen

By

Attorneys for defendant CITY OF OAKLAND

DATED: July \_\_, 2005

Fred M. Feller  
Ramon M. Gonzalez

By

Attorneys for defendants JAMES WEISS and  
EVA GARCIA

2005, deposition will not be disclosed to the public.

The parties agree not to disclose this information to the public as the nature of Mr. Montalvo's security business requires him to come into contact with drug dealers, thieves and gang members. Disclosing Mr. Montalvo's personal and confidential information to the public has a potential of jeopardizing the safety of Mr. Montalvo and his family.

DATED: July \_\_, 2005

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JEFFERY G. BAIREY  
KIMBERLEI D. EVANS

By

Kimberlei D. Evans  
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AGENCY, INC., LEONARD MONTALVO,  
DAVID POLARIS, and WEISS SULTAN

DATED: July \_\_, 2005

Steven R. Jacobsen  
James L. Armstrong

By

Attorneys for plaintiffs

DATED: July \_\_, 2005

Arlene M. Rosen


By

Attorneys for defendant CITY OF OAKLAND

DATED: July 14, 2005

Fred M. Feller  
Ramon M. Gonzalez

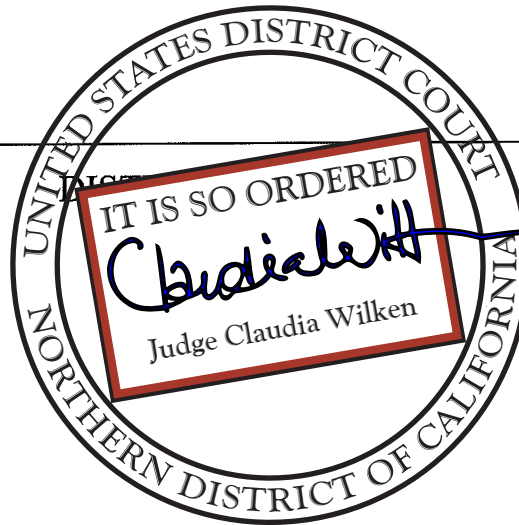
By

  
Attorneys for defendants JAMES WEISS and  
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1 IT IS SO ORDERED this 10th day of August, 2005.



LEWIS BRISBOIS BIGGAARD & SMITH LLP

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TELEPHONE (415) 362-2580

**PROOF OF SERVICE**

*Alejandra Cruz, et al. v. The City of Oakland, et al.*

United States District Court, Northern District of California, Case No. C 04 00179 CW

STATE OF CALIFORNIA, COUNTY OF SAN FRANCISCO

I am employed in the County of San Francisco, State of California. I am over the age of 18 and not a party to the within action. My business address is One Sansome Street, Suite 1400, San Francisco, CA 94104.

On this same date, I served documents via the United States District Court Northern District of California's Electronic Case Filing system described as follows:

**STIPULATION TO PROTECTIVE ORDER**

on designated recipients (as currently maintained as of the date and time of this filing on the United States District Court Northern District of California's Electronic Case Filing system) through electronic transmission through the United States District Court Northern District of California's Electronic Case Filing system. Upon completion of said transmission of said documents, a certified receipt is issued to filing party acknowledging receipt by the United States District Court Northern District of California's Electronic Case Filing system. Once the United States District Court Northern District of California's Electronic Case Filing system has served all designated recipients, proof of electronic service is returned to the filing party.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on July 21, 2005, at San Francisco, California.

/s/ Meryle Mishkin  
MERYLE MISHKIN